

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ENCOMPASS INSURANCE COMPANY OF)	
MASSACHUSETTS,)	
)	
Plaintiff/Defendant-in-Counterclaim,)	
)	
v.)	
)	
JOSEPH D. GIAMPA, FREDERICK T.)	Case No. 05-11693 RCL
GIAMPA, ADVANCED SPINE CENTERS, INC.)	
d/b/a FIRST SPINE REHAB, FUTURE)	
MANAGEMENT CORPORATION, FUTURE)	
MANAGEMENT BUSINESS TRUST, EDWARD)	
KENNEDY, BRIAN J. CULLINEY, D.C. and)	
JENNIFER MCCONNELL, D.C.,)	
)	
Defendants.)	
)	

STIPULATION

The parties to the above-referenced matter hereby stipulate and agree that: (1) the time for Defendants to file an opposition to Plaintiff/Counterclaim Defendant's Omnibus Motion to Dismiss Defendants/Counterclaim Plaintiffs' Counterclaims ("Defendants' Opposition") is extended up to and including Friday, March 30, 2007, and (2) Defendants shall not oppose any motion filed by Plaintiff/Counterclaim Defendant seeking leave to reply to Defendants' Opposition.

Respectfully Submitted
Encompass Insurance Company
 By its attorneys,

/s/ Jay B. Kesten

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Respectfully Submitted
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/s/ Thomas M. Ciampa

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Respectfully Submitted
Joseph D. Giampa, Frederick T. Giampa,
Advanced Spine Centers, Inc. d/b/a First Spine,
and Future Management Corporation
By their attorneys,

/s/ Mathew J. Conroy

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Respectfully Submitted
Edward Kennedy
By his attorneys,

/s/ Jeffrey Philips

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Dated: March 23, 2007

Certificate of Service

I hereby certify that this document filed through the ECF system pursuant to Local Rule 5.4 will be sent electronically to all other parties.

____/s/ Thomas M. Ciampa____